

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OHIO  
EASTERN DIVISION

|                             |   |                            |
|-----------------------------|---|----------------------------|
| PFG VENTURES, L.P.,         | ) |                            |
|                             | ) | CASE NO. 1:21-cv-02205-JPC |
| Plaintiff,                  | ) |                            |
|                             | ) | JUDGE J. PHILIP CALABRESE  |
| v.                          | ) |                            |
|                             | ) |                            |
| BKEN, INC. et al.,          | ) |                            |
|                             | ) |                            |
| Defendants.                 | ) |                            |
| <hr/>                       |   |                            |
| PFG VENTURES, L.P.,         | ) |                            |
|                             | ) | CASE NO. 1:22-cv-01177-JPC |
| Plaintiff,                  | ) |                            |
|                             | ) | JUDGE J. PHILIP CALABRESE  |
| v.                          | ) |                            |
|                             | ) |                            |
| BRANDON C. KENNEDY, ET AL., | ) |                            |
|                             | ) |                            |
| Defendants.                 | ) |                            |

**DECLARATION OF JAMES M. SUSAG, ESQ.**

I, James M. Susag, declare as follows:

1. I am an attorney with Larkin Hoffman, located at 8300 Norman Center Drive, Suite 1000, Minneapolis, MN 55437.

2. I submit this declaration in support of my application to appear as counsel *pro hac vice* in this matter on behalf of Plaintiff, PFG Ventures, LP, which Tucker Ellis LLP represents on various matters and of which my knowledge may serve to expedite these proceedings for all parties and the Court.

3. I am a member in good standing with the Minnesota state bar and was admitted to practice in 1995.

4. I am also a member in good standing with the state bar in Wisconsin and Washington.

5. I am admitted to practice in the following courts: the U.S. District Court, District of Minnesota, the U.S. District Court, Western District of Wisconsin, the U.S. District Court, Northern District of New York, the U.S. Court of Appeals, 4th Circuit, the U.S. Court of Appeals, 7th Circuit, and the U.S. Court of Appeals, 8th Circuit.

6. I have never been disbarred or suspended from the practice before any court, department, bureau, or commission of any State of the United States, nor have I ever received any reprimand from any such court, department, bureau, or commission pertaining to conduct or fitness as a member of the bar.

6. I agree to be governed by the Rules of this Court and all applicable disciplinary rules and procedures governing the conduct of attorneys who appear before this Court.

7. I respectfully request that the Court grant my admission *pro hac vice* in this case.

Pursuant to 8 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Date: December 19, 2022

/s/James M. Susag

James M. Susag, Esq.